

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

In Re: New York City Policing During Summer 2020 Demonstrations

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This filing is related to:

ALL CASES

20 Civ. 8924 (CM)(GWG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Abigail B. Everdell dated May 7, 2025, and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings heretofore had herein, Plaintiffs in the Consolidated Protest Cases—comprised of *Gray et al. v. City of New York et al.*, No. 21-CV-6610; *Payne, et al., v. de Blasio et al.*, No. 20-CV-8924; *People of the State of New York v. City of New York et al.*, No. 21-CV-322; and *Rolon et al. v. City of New York*, No. 21-CV-2548—respectfully move this court, before the Honorable Colleen McMahon at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for an order in accordance with Paragraph 101(d) of the parties’ Stipulated Order Pursuant to Fed. R. Civ. P. 41(a)(2) (Dkts. 1099-2 and 1166-1; entered at Dkt. 1167) (“Stipulated Order”) compelling Defendant the City of New York to implement Paragraph 89(h) of the Stipulated Order, and for an order pursuant to Paragraph 138 of the Stipulated Order awarding Plaintiffs their reasonable costs and fees incurred in making this motion.

Dated: May 7, 2025, New York, New York

/s/ Robert D. Balin

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